

1 HONORABLE JAMES L. ROBART
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 CARMEN JOHN PERRI, and individual,

12 Plaintiff, No. 2:19-cv-00137-JLR

13 v.

14 425 QUEEN ANNE, LLC, a Washington
15 limited liability company,
16 Defendant.

17 425 QUEEN ANNE LLC'S
18 STIPULATED MOTION AND
19 ~~PROPOSED~~ ORDER TO EXTEND
20 TIME TO ANSWER COMPLAINT

21 NOTE ON MOTION CALENDAR:
22 FEBRUARY 28, 2019

23

24 Defendant 425 QUEEN ANNE, LLC hereby respectfully requests that, for the following
25 reasons, the Court extend the deadline to file its Answer to the Complaint in this case to
26 Thursday, March 14, 2019. By their signature below, the Plaintiff in this action stipulates to
27 this Motion.

28 425 Queen Anne LLC respectfully submits that good cause exists for the extension for
29 the following reasons:

30 1. The Defendant's counsel filed its appearance on February 20, 2019.
31 2. Counsel for the Defendant requires adequate time to review client records and
32 confer.
33 3. An extension of time to file the Answer through March 14, 2019 will not
34 substantially delay the case.

35 425 QUEEN ANNE LLC'S STIPULATED MOTION TO
36 EXTEND TIME TO ANSWER COMPLAINT- 1
37 2:19-cv-00137-JLR

38 **BERESFORD ♦ BOOTH PLLC**
39 145 THIRD AVENUE SOUTH
40 EDMONDS, WASHINGTON 98020
41 (425) 776-4100 / (425) 776-1700 fax

For the foregoing reasons, 425 Queen Anne, LLC respectfully requests an extension of time to Answer the Plaintiff's Complaint.

Stipulated and Agreed this 28th day of February, 2019.

THE LAW OFFICE OF DAN N. FIORITO, III BERESFORD BOOTH PLLC

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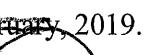
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Attorneys for 425 Queen Anne LLC

[PROPOSED] ORDER

Based on the Stipulation of the Parties, IT IS HEREBY ORDERED that;

The deadline for Defendant 425 Queen Anne LLC to Answer the Plaintiff's Complaint has been extended to March 14, 2019.

DONE IN OPEN COURT this 1 day of February, 2019.

March
February, 2019.

HONORABLE JAMES L. ROBART

425 QUEEN ANNE LLC'S STIPULATED MOTION TO
EXTEND TIME TO ANSWER COMPLAINT- 2
2:19-cv-00137-JLR

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CERTIFICATE OF SERVICE

I hereby certify that on February 28th, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the following attorneys/interested parties:

Dan N. Fiorito, III
Attorney for Plaintiff

By: /s/ Leah Bartoces
Leah Bartoces, Paralegal